

# **Exhibit C**

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20 UNITED STATES DISTRICT COURT  
21 NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 ORACLE AMERICA, INC.

Case No. CV 10-03561 WHA

24 Plaintiff,

**PLAINTIFF'S INTERROGATORIES  
TO DEFENDANT GOOGLE INC.,  
SET FOUR**

25 v.

26 GOOGLE INC.

Dept.: Courtroom 9, 19th Floor  
Judge: Honorable William H. Alsup

27 Defendant.

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1 PROPOUNDING PARTY: PLAINTIFF ORACLE AMERICA, INC.

2 RESPONDING PARTY: DEFENDANT GOOGLE, INC.

3 SET: FOUR (Nos. 20-25)

4 In accordance with Federal Rule of Civil Procedure 33, Plaintiff Oracle America, Inc.  
5 (“Oracle”) hereby propounds the following interrogatories to Defendant Google Inc. (“Google”),  
6 to be answered in writing within 30 days from service.

7 **DEFINITIONS AND INSTRUCTIONS**

8 As used below, the following terms have the meanings indicated:

9 1. “Java Platform” refers to the Java programming language, the Java compiler, the  
10 Java Virtual Machine, the Java Development Kit, the Java Runtime Environment, the Just-In-  
11 Time compiler, Java class libraries, Java application programming interfaces, and Java  
12 specifications and reference implementations.

13 2. “Android” means “the Android Platform” and “Android” as referred to in  
14 Google’s Answer (Docket No. 32) at Background ¶ 12 and in Google’s Answer to Amended  
15 Complaint (Docket No. 51) at Background ¶ 12 and at Factual Background ¶¶ 11–17, and  
16 includes any versions thereof (whether released or unreleased) and related public or proprietary  
17 source code, executable code, and documentation.

18 3. “Google” or “You” means Google Inc. and any companies that Google Inc. has  
19 acquired, including Android, Inc. In directing these interrogatories to Google, we seek all  
20 information available to Google, including information relating to companies Google has  
21 acquired (such as Android, Inc.).

22 **INTERROGATORIES**

23 **INTERROGATORY NO. 20:**

24 Identify and describe in detail any non-infringing alternatives to the Android technologies  
25 alleged to infringe the patents-in-suit and copyrights-in-suit considered by or available to Google  
26 from the time Google began to develop Android up to and including the release of version 2.2  
27 (“Froyo”), including Google’s basis for rejecting each identified alternative.

1       **INTERROGATORY NO. 21:**

2              Identify and describe in detail each modification made by third parties to the allegedly-  
3 infringing portions of Android source code and documentation identified by Oracle's copyright  
4 and patent infringement contentions, including the author of, date of, and basis for each such  
5 modification.

6       **INTERROGATORY NO. 22:**

7              Describe in detail the steps that Google and Android device manufacturers perform to  
8 retrieve, port, load, install, test, and/or execute Android on Android devices, including without  
9 limitation the person or entity that performs each step and the physical location where each step is  
10 performed.

11       **INTERROGATORY NO. 23:**

12              Please state the total amount of projected and actual advertising revenue from Android  
13 devices (separately for phones and for other devices) that Google projected it would earn or has  
14 earned in the United States separately for each month from November 2007 through December  
15 2013.

16       **INTERROGATORY NO. 24:**

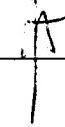
17              Identify and describe in detail all ways in which Google has reduced or expects to reduce  
18 the amount of revenue sharing with third parties in connection with Android, including without  
19 limitation the total amount of reduced revenue sharing that Google anticipated as of October 2007  
20 and October 2008 in connection with Android.

21       **INTERROGATORY NO. 25:**

22              Identify (by production number, date, and author for any documents) and describe in  
23 detail the basis for and materials considered in deriving all mobile revenue, profit, and unit  
24 projections (written or otherwise) made from July 2005 through December 2008, broken out by  
25 Android and non-Android revenue, profit, and unit projections.

1 Dated: June 29, 2011

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